

# **Exhibit 2**

EXHIBIT 2. CPT'S PROPOSED CLAIM CONSTRUCTION FOR U.S. PATENT 5,019,002

Asserted Claims	CPT's Proposed Constructions	LPL's Construction <sup>1</sup>
1. A method of manufacturing active matrix display backplanes and displays therefrom, comprising: providing a substrate; forming a pattern of pixels on said substrate; forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another;	1. <b>“Interconnecting substantially all of said row lines to one another.”</b> Electrically connecting with conductors all, or nearly all, of row lines to one another.  2. <b>“Interconnecting ... substantially all of said column lines to one another.”</b> Electrically connecting with conductors all, or nearly all, of column lines to one another.  3. <b>“Electrostatic discharge.”</b> Flow of electrical current caused by a build-up of static electrical charges.	<b>“Interconnecting.”</b> Shorting.  No proposed construction offered. LPL merely stated that it did not agree with CPT's way of separating the two “interconnecting” elements.  <b>“Electrostatic discharge.”</b> “A release of current resulting from a voltage differential by static electricity.”

<sup>1</sup> Based on LPL's proposed claim construction served before the Parties' meet and confer on March 2, 2006, and an email and letter supplement served afterwards.

<p>and column activation lines during manufacture of the displays; and</p>	<p>4. <b>“Outer electrostatic discharge guard ring.”</b> A ring of conductor, located external to the inner electrostatic discharge guard ring if the two rings are used together, for draining off electrostatic buildup to prevent electrostatic discharge.</p>	<p><b>“Outer electrostatic discharge guard ring.”</b> “A closed or open ring, or open L or C-shaped line, outside the active matrix display to provide protection from electrostatic discharges.”</p>
	<p>5. <b>“Resistance.”</b> A resistance, as it is used in the claims, means a resistor, which is a circuit element that has a specified resistance to the flow of electrical current. A resistance does not include switching elements such as transistors and diodes.</p>	<p><b>“Resistance.”</b> “any component used to cause a voltage drop during current flow.”</p>
	<p>6. <b>“Coupled to said interconnected row and column lines via a resistance.”</b> Linked through one or more resistors to the interconnected column lines and to the interconnected row lines.</p>	<p><b>“Coupled to said interconnected row and column lines via a resistance.”</b> “electrically connected to said interconnected row and column lines via a resistance.”</p>
<p>removing said outer guard ring and row and column interconnections prior to completion of the display.</p>	<p>7. <b>“Removing said guard ring and row and column interconnections.”</b> Electrically disconnecting the interconnections between rows and between columns and disconnecting rows</p>	<p><b>“Removing said guard ring and row and column interconnections.”</b> “physically disconnecting said guard ring and row and column interconnections.”</p>

	and columns from the outer guard ring.	
2. The method as defined in claim 1 including coupling one plurality of said interconnected row and column lines to said outer guard ring via said resistance.		
3. The method as defined in claim 2 including forming at least one pickup pad coupled to said resistance via a shunt switching element.	8. <b>"Pick-up pad:"</b> A pad located at the corner region of a backplane for aligning the frontplane and backplane, or equivalents thereof.	<b>"Pick-up pad:"</b> "A conductive area used to electrically connect the back plane to the front plane."
	9. <b>"Shunt switching element:"</b> A device that is capable of switching between on and off states (e.g., a transistor or diode) to open or close a by-pass for diverting electrical current.	<b>"Shunt switching element:"</b> "A parallel switching device."
4. The method as defined in claim 3 including coupling said pickup pad to the other plurality of said interconnected row and column lines via another shunt switching element.		
5. The method as defined in claim 3 including forming a corner on said pad to align the front plane and back plane of the display.		
6. The method as defined in claim 3 including forming a plurality of pickup pads, each one on a separate corner of the		

display.			
7. The method as defined in claim 1 including forming a corner pad on at least one corner of the display and aligning scribe lines with said corner pad for removing said outer guard ring and row and column intersections.	10. <b>"Corner pad:"</b> A pad of metal or other conductive materials that is located at the corner of an outer guard ring, and electrically connected with the outer ring.	<b>"Corner pad:"</b> "a reference mark for cutting."	
	11. <b>"Scribe line:"</b> A predefined line along which the glass substrate can be marked with a sharp tool either to disconnect the conductor patterns along the line or to initiate the fracture of the glass substrate along the line.	<b>"Scribe line:"</b> "cutting line based on reference marks."	
	12. <b>"Aligning scribe lines with said corner pad for removing said outer guard ring and row and column intersections:"</b> Aligning each scribe line with one edge of the corner pad for removing the outer guard ring and the row and column interconnections.	<b>"Aligning scribe lines with said corner pad for removing said outer guard ring and row and column intersections:"</b> "adjusting the cutting lines with a reference mark."	
8. The method as defined in claim 1 including forming an inner electrostatic discharge guard ring on said substrate coupled to said row and column lines via shunt switching elements to provide protection from electrostatic discharges between said row and column activation	13. <b>"Inner electrostatic guard ring:"</b> A ring of conductor, located internal to the outer electrostatic discharge guard ring if the two rings are used together, for draining off electrostatic buildup to	No construction offered.	

lines during manufacture of the displays and thereafter.	prevent electrostatic discharge.	
9. The method as defined in claim 8 including forming separate shunt switching elements between said inner guard ring and each row and column line.		
12. The method as defined in claim 10 including interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another and forming an outer electrostatic discharge guard ring on said substrate coupled to said interconnected row and column lines via a resistance to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays; and		
removing said outer guard ring and row and column interconnections prior to completion of the display.		
13. The method as defined in claim 12 including coupling one plurality of said interconnected row and column lines to said outer guard ring via said resistance.		
14. The method as defined in claim 13 including forming at least one pickup pad		

coupled to said resistance via a shunt switching element.		
15. The method as defined in claim 14 including coupling said pickup pad to the other plurality of said interconnected row and column lines via another shunt switching element.		
16. The method as defined in claim 14 including forming a corner on said pad to align the front plane and back plane of the display.		
17. The method as defined in claim 10 including forming a plurality of pickup pads, each one on a separate corner of the display.		
18. The method as defined in claim 10 including forming a corner pad on at least one corner of the display and aligning scribe lines with said corner pad for removing said outer guard ring and row and column intersections.	Claim 18 is indefinite for lack of antecedent basis and for lack of proper written description. To the extent that claim 18 can be construed as all, it should include all the limitations of claim 1 or claim 12	
35. The backplane as defined in claim 28 including a plurality of pickup pads, each one formed on a separate corner of the display.		